

**Joseph & Norinsberg LLC**  
Fighting for Employee Justice



**Queens Office**  
69-06 Grand Avenue, 3rd Floor  
Maspeth, New York 11378

**Manhattan Office**  
110 East 59th Street, Suite 2300  
New York, New York 10022

**Newark Office**  
One Gateway Center, Suite 2600  
Newark, New Jersey 07102

**Philadelphia Office**  
1515 Market Street, Suite 1200  
Philadelphia, Pennsylvania 19102

**Boston Office**  
225 Franklin Street, 26th Floor  
Boston, Massachusetts 02110

**Orlando Office**  
300 N. New York Ave, Suite 832  
Winter Park, Florida 32790

Jon L. Norinsberg, Esq.  
[jon@norinsberglaw.com](mailto:jon@norinsberglaw.com)

December 17, 2024

**VIA ECF**

Hon. Arun Subramanian  
United States District Judge  
500 Pearl Street, Room 702  
United States Courthouse  
New York, NY 10007  
(212) 805-6120

**Re: Turner v. Nightjar Holdings**  
**Case No. 24-cv-08106-AS**

Dear Judge Subramanian:

Our firm represents Plaintiff, Mr. Tavon Turner ("Plaintiff"), in the above-referenced matter under the Americans with Disabilities Act ("ADA") against Defendant, Nightjar Holdings, LLC ("Defendant"). This action was filed on October 24, 2024, and served upon the Defendant on October 28, 2024 (Docket No. 6). By Order dated November 20, 2024, the deadline for the Defendant to respond to the Complaint was extended to December 18, 2024 (Dkt. No. 9).

Ms. Lauren Rudick, Esq., counsel for the Defendant, contacted the undersigned via email on December 12, 2024, to request our consent to an additional 30-day extension of time to submit their Answer. This extension would move the deadline from December 18, 2024, to January 17, 2024. Our office consents to said extension request to allow for the Defendant to finalize their assessment of our proposed confidential Settlement Agreement, which we exchanged on December 15, 2024.

The Initial Case Conference is currently scheduled for January 24, 2025, at 1:00 p.m. It is anticipated that the parties will finalize the Settlement Agreement prior to this conference. Therefore, we respectfully request that the Court adjourn the conference sine die. The parties remain committed to resolving this matter expeditiously and will promptly inform the Court upon reaching a resolution.

Thank you for your attention to this matter.

Respectfully submitted,

**JOSEPH & NORINSBERG, LLC**



Arjeta Albani, Esq.  
Jon L. Norinsberg, Esq.  
Bennitta L. Joseph, Esq.  
*Attorneys For Plaintiff*  
110 East 59<sup>th</sup> Street,  
Suite 2300  
N.Y., N.Y. 10022  
(212) 227-5700  
Fax No. (212) 656-1889  
[arjeta@employeejustice.com](mailto:arjeta@employeejustice.com)  
[jon@norinsberglaw.com](mailto:jon@norinsberglaw.com)  
[bennitta@employeejustice.com](mailto:bennitta@employeejustice.com)

SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: December 18, 2024

c.c.

**Lauren A. Rudick**  
Managing Principal  
Rudick Law Group, PLLC  
O: +1(212) 369-4200 | M: +1(917) 405-4206  
[LRudick@rudicklawgroup.com](mailto:LRudick@rudicklawgroup.com)  
[www.rudicklawgroup.com](http://www.rudicklawgroup.com)